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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

GREGORY WOCHOS, individually and on  
behalf of all others similarly situated,

Case No.: 3:17-cv-05828-CRB

Plaintiff,

v.

TESLA, INC., ELON R. MUSK, DEEPAK  
AHUJA, and JASON WHEELER,

**SCHEDULING STIPULATION AND  
[PROPOSED] ORDER**

Defendants.

1        WHEREAS, by Order dated February 2, 2018 (ECF No. 21), Pursuant to Section  
2 21D(a)(3)(B) of the Securities Exchange Act of 1934, 15 U.S.C. §78u-4(a)(3)(B), this Court  
3 appointed Kurt Friedman as “Lead Plaintiff” in this securities class action and approved his selection  
4 of The Rosen Law Firm, P.A., as Lead Counsel; and

5        WHEREAS, following the appointment of Lead Plaintiff and Lead Counsel, the parties have  
6 met and conferred and agreed on a schedule for Lead Plaintiff to file an amended complaint and for  
7 Defendants’ responses thereto;

8        NOW THEREFORE, the parties stipulate and agree as follows:

- 9            1. Lead Plaintiff shall file his Amended Complaint on or before March 23, 2015;
- 10            2. Defendants shall answer or otherwise respond to the Amended Complaint on or before  
11            May 25, 2018;
- 12            3. If any Defendant files a motion to dismiss the Amended Complaint, Lead Plaintiff  
13            shall file any opposition thereto on or before July 11, 2018;
- 14            4. Any Defendant who files a motion to dismiss may file a reply on or before August 17,  
15            2018.

16        Dated: February 9, 2018

**FENWICK & WEST LLP**

17            /s/ Jennifer Bretan

18            Jennifer Bretan  
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24            *Counsel for Defendants*

## **THE ROSEN LAW FIRM, P.A.**

/s/ Jacob A. Goldberg  
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## ***Lead Counsel for Lead Plaintiff and the Putative Class***

Pursuant to Civil Local Rule 5-1(i)(3), all signatories concur in filing this stipulation.

/s/ Jacob A. Goldberg  
Jacob A. Goldberg (*pro hac vice*)

## [PROPOSED] ORDER

Upon stipulation of the parties, and good cause appearing:

IT IS SO ORDERED.

Dated: February , 2018

**The Honorable Charles R. Breyer  
United States District Judge**